REMARKS

The Advisory Action mailed February 2, 2007 has been carefully considered. In the Advisory Action, Claims 1-18 and 22-25 are pending and all claims have been finally rejected. Claims 1, 22, and 23 have been amended, as in the previous un-entered response, and Applicants respectfully submit that the modification to the claims is supported by the originally filed application. Reconsideration of the rejection of Claims 1-18 and 22-25 is hereby requested in view of the amendment of Claims 1, 22, and 23 and the following remarks.

Applicants respectfully disagree with the reasons given to maintain the rejections and not enter the previous response. However, in the interest of advancing the prosecution of this matter, Applicants have elected to submit a Request for Continued Examination of the application in view of the amendments to the claims presented. Applicants have kept the modifier, currently amended, on claims submitted in response to the Final Office Action but not entered per the advisory action. Applicants have also, as requested in the Office Action, changed the modifier "new" to be currently amended for claims 24 and 25.

The Final Office Action maintained the rejection of Claims 1-8, 11, and 13-21 as being anticipated under 35 U.S.C 102(e) by U.S. Patent No. 6,901,554 to Bahrs et al. ("Bahrs") as well as rejecting Claims 22-25 in light of Bahrs. These rejections are hereby traversed and allowance of Claims 1-8, 11, and 13-25 is respectfully requested in light of the amendment of Claims 1, 22, and 23 and the arguments presented herein. Claims 1, 22, and 23 as suggested by the Office Action has been modified to better specify and more clearly claim the disclosed invention.

The Final Office Action also maintained the rejection of Claims 9, 10, and 12 under 35 U.S.C. 103(a) as un-patentable over Bahrs in view of U.S. Patent No. 6,615,131 to Rennard et al. ("Rennard"). Applicants herein argue that neither Bahrs nor Rennard, in combination or isolation, anticipates the current invention, there is no motivation to combine these references, and request removal of this rejection. These rejections are hereby traversed and allowance of Claims 9, 10, and 12 is respectfully requested in light of the amendment of Claims 1, 22, and 23 and the arguments presented herein.

Respectfully, Applicants assert that none of the references cited by the Office Action, together or in isolation, teach the disclosed invention. Therefore removal of the 35 U.S.C. 102 and 35 U.S.C. 103 (a) rejections is requested.

An aspect of Applicants' application is a method for delivering an application over a network in which the business logic of the application is running on a backend server. The application invokes a GUI API to present the application's user interface, replacing the GUI API with a re-implemented, network aware GUI API running on a backend server. The re-implemented, network aware GUI API translates the application's presentation layer information into pre-determined format based messages. The pre-determined format based messages describe a Graphical User Interface, event processing registries, and other related information corresponding to the presentation layer of the application in high level, object level, messages. The messages are sent to the client device via a network, processing the messages and rendering a user interface by a client-side program. The client-side program delivers a user experience for that device according to the capability of the specific client device, renders the user interface on the client device, and transmits a plurality of necessary user input and a plurality of client-side

events back to the server by the client-side program via a predetermined protocol. The user

input and client-side events are processed on the backend server, translating the events and

inputs as if they were locally generated, and sending such translated events and inputs to the

application for processing. The output of the application is encoded and routed to the client

device using the predetermined messaging format. The client-side program processes the output

by the client-side program to refresh the Graphical User Interface threat; wherein use of the re-

implemented network aware API enables the application to be developed once and deployed

multiple times.

102 Rejections

Claims 1, 2-18, and 24-25

As suggested in the Office Action, in Claim 1, Applicants now better specify the claimed

invention with the amended claim language that "the GUI API with a re-implemented, network

aware GUI API running on a backend server" such that "use of the re-implemented network

aware API enables the application to be developed once and deployed multiple times." Bahrs

does not teach or suggest an application "developed once and deployed multiple times" and

therefore does not have the advantages provided by Applicants' claimed invention. Therefore,

Applicants respectfully request reconsideration and allowance of amended Claims 1 and

dependant Claims Claims 1-8, 11, and 13-25.

Applicants' claimed invention has patentable differences over the Bahrs reference now

discussed in detail. The Bahrs reference "provides an architectural pattern for creating

applications for a data processing system."…"an architectural pattern for views in a client" Bahrs

Column 2 lines 55-56; Column 14 lines 37-39. This architectural pattern is "illustrated [in

Bahrs] as a Java implementation for building thin (or thick) client applications and is also referred to as 'JTC.'" Bahrs Column 15 lines 28-31. "JTC is a process, architectural pattern, and implementation guide to developers on how to build applications, and in particular, Internet style thin clients." Bahrs Column 15 lines 31-33. Further, JTC provides "a common repeatable programming pattern." Bahrs Column 15 lines 34-35. "Thus, [Bahrs] . . . provides an architectural pattern that may be used to create . . . applications . . .[where] through the architectural pattern of the present invention, the object reuse on a client may be between 50 to 100 percent." Bahrs Column 65 lines 41-47.

Conversely, the current invention has a "re-implemented, network aware API" "wherein use of the re-implemented network aware API enables an application to be developed once and deployed multiple times." Bahrs provides a "process, architectural pattern, and implementation guide on how to build applications" while the current invention presents a different solution allowing a "developed once" application to be "deployed multiple times" through the use of the "re-implemented, network aware API." That is, Bahrs presents a method "on how to build applications" where the current invention enables an application to be "developed once and deployed multiple times." These are different inventions and do not perform the same function. Therefore, Applicants assert that the Bahrs patent can be used for a 102 rejection of Claim 1 as it does not teach or suggest every aspect of the current invention.

Rather, Bahrs is an example of why the current invention is not anticipated by the prior art. Previous solutions, such as the one outlined in Bahrs, have focused on working with the current architectural components provided in API systems. Bahrs focuses on "on how to build applications" "for views in the client." Bahrs Column 14 lines 37-38; Column 15 lines 31-33.

The current invention however, uses a different approach. The current invention takes an application "developed once" and uses a "re-implemented network aware API" to "deploy[ed] multiple times" and a "client-side program" to "deliver[s] a user experience for that device according to the capability of the specific client device." Instead of Bahrs method of using an "architectural pattern" "to guide developers on how to build applications," the current invention "enables the application to be developed once and deployed multiple times."

Based on the foregoing arguments Applicants believe Claim 1 is now allowable. Applicants respectfully request Examiner remove this rejection and place this claim in condition for allowance. Further, dependent Claims 2-8, 11, and 13-25 are rejected under 35 U.S.C. 102 as being un-patentable over Bahrs. These rejections are also respectfully traversed. Based on Applicants' arguments above, Applicants assert independent Claim 1 is now allowable. Since Claims 2-8, 11, and 13-25 depend from Claim 1 these claims are allowable for at least the same reasons as the claim from which they depend. Accordingly, Applicants believe the rejections under 35 U.S.C. 102 are moot and should be withdrawn.

Claim 22

As suggested in the Office Action, in Claim 22, Applicants now better specify the claimed invention with the amended claim language such that "use of the system enables the application to be developed once and deployed multiple times." Bahrs does not teach or suggest an application "developed once and deployed multiple times" and therefore does not have the advantages provided by Applicants' claimed invention.

Applicants' claimed invention has patentable differences over the Bahrs reference now discussed in detail. The Bahrs reference "provides an architectural pattern for creating

applications for a data processing system."..."an architectural pattern for views in a client" Bahrs

Column 2 lines 55-56; Column 14 lines 37-39. This architectural pattern is "illustrated [in

Bahrs] as a Java implementation for building thin (or thick) client applications and is also

referred to as 'JTC.'" Bahrs Column 15 lines 28-31. "JTC is a process, architectural pattern,

and implementation guide to developers on how to build applications, and in particular, Internet

style thin clients." Bahrs Column 15 lines 31-33. Further, JTC provides "a common repeatable

programming pattern." Bahrs Column 15 lines 34-35. "Thus, [Bahrs] . . . provides an

architectural pattern that may be used to create . . . applications . . .[where] through the

architectural pattern of the present invention, the object reuse on a client may be between 50 to

100 percent." Bahrs Column 65 lines 41-47.

      Conversely, the current invention "enables the application to be developed once and

deployed multiple times." Bahrs provides a "process, architectural pattern, and implementation

guide on how to build applications" while the current invention presents a different solution

allowing a "developed once" application to be "deployed multiple times" through the use of the

"re-implemented, network aware API." That is, Bahrs presents a method "on how to build

applications" where the current invention enables an application to be "developed once and

deployed multiple times." These are different inventions and do not perform the same function.

Therefore, Applicants assert that the Bahrs patent can be used for a 102 rejection of Claim 22 as

it does not teach or suggest every aspect of the current invention.

      Rather, Bahrs is an example of why the current invention is not anticipated by the prior

art. Previous solutions, such as the one outlined in Bahrs, have focused on working with the

current architectural components provided in API systems. Bahrs focuses on "on how to build

applications" "for views in the client." Bahrs Column 14 lines 37-38; Column 15 lines 31-33.

The current invention however, uses a different approach. The current invention takes a

"developed once" enables it to be "deployed multiple times." Instead of Bahrs method of using

"architectural pattern" "to guide developers on how to build applications," the current invention

"enables the application to be developed once and deployed multiple times."

      Based on the foregoing arguments Applicants believe Claim 22 is now allowable.

Applicants respectfully request Examiner remove this rejection and place this claim in condition

for allowance.

Claim 23

      As suggested in the Office Action, in Claim 23, Applicants now better specify the

claimed invention with the amended claim language that "the GUI API with a re-implemented,

network aware GUI API running on a backend server" such that "use of the re-implemented

network aware API enables the application to be developed once and deployed multiple times."

Bahrs does not teach or suggest an application "developed once and deployed multiple times"

and therefore does not have the advantages provided by Applicants' claimed invention.

Therefore, Applicants respectfully request reconsideration and allowance of amended Claim 23.

      Applicants' claimed invention has patentable differences over the Bahrs reference now

discussed in detail. The Bahrs reference "provides an architectural pattern for creating

applications for a data processing system."…"an architectural pattern for views in a client" Bahrs

Column 2 lines 55-56; Column 14 lines 37-39. This architectural pattern is "illustrated [in

Bahrs] as a Java implementation for building thin (or thick) client applications and is also

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Conversely, the current invention has a "re-implemented network aware API" "wherein use of the re-implemented network aware API enables the application to be developed once and deployed multiple times." Bahrs provides a "process, architectural pattern, and implementation guide on how to build applications" while the current invention presents a different solution allowing a "developed once" application to be "deployed multiple times" through the use of the "re-implemented, network aware API." That is, Bahrs presents a method "on how to build applications" where the current invention enables an application to be "developed once and deployed multiple times." These are different inventions and do not perform the same function. Therefore, Applicants assert that the Bahrs patent can be used for a 102 rejection of Claim 23 as it does not teach or suggest every aspect of the current invention.

Rather, Bahrs is an example of why the current invention is not anticipated by the prior art. Previous solutions, such as the one outlined in Bahrs, have focused on working with the current architectural components provided in API systems. Bahrs focuses on "on how to build applications" "for views in the client." Bahrs Column 14 lines 37-38; Column 15 lines 31-33. The current invention however, uses a different approach. The current invention takes a "developed once" and uses a "re-implemented network aware API" to "deploy[ed] multiple

times" and a "client-side program" to "deliver[s] a user experience for that device according to the capability of the specific client device." Instead of Bahrs method of using "architectural pattern" "to guide developers on how to build applications," the current invention "enables the application to be developed once and deployed multiple times."

Based on the foregoing arguments Applicants believe Claim 23 is now allowable. Applicants respectfully request Examiner remove this rejection and place this claim in condition for allowance.

103 Rejections

Applicants incorporate the arguments of Claim 1 and further respectfully assert that Rennard does not cure the deficiencies of Bahrs and there is no motivation to combine these references; neither Rennard nor Bahrs, together or in isolation, teach the inventions of Claims 9, 10, and 12.

Rennard relates to "navigation systems and location-based information delivery . . . specifically . . . to a method and system for an efficient operation environment for interactive and real-time navigation." Rennard Column 1 lines 10-14. In this method and system, Rennard teaches "an architecture for an interactive real-time distributed navigation system." Rennard Column 5 lines 7-8. Rennard provides a "foundation class" which "makes it significantly easier to create WML applications." Rennard Column 8 lines 27-28. Rennard also provides methods "for generating a route from a specific origin to a fuzzy destination" Rennard Column 13 lines 22-24.

The Bahrs reference "provides an architectural pattern for creating applications for a data processing system."..."an architectural pattern for views in a client" Bahrs Column 2 lines 55-

56; Column 14 lines 37-39. This architectural pattern is "illustrated [in Bahrs] as a Java implementation for building thin (or thick) client applications and is also referred to as 'JTC.'" Bahrs Column 15 lines 28-31. "JTC is a process, architectural pattern, and implementation guide to developers on how to build applications, and in particular, Internet style thin clients." Bahrs Column 15 lines 31-33. Further, JTC provides "a common repeatable programming pattern." Bahrs Column 15 lines 34-35. "Thus, [Bahrs] . . . provides an architectural pattern that may be used to create . . . applications . . .[where] through the architectural pattern of the present invention, the object reuse on a client may be between 50 to 100 percent." Bahrs Column 65 lines 41-47.

Conversely, the current invention has a "re-implemented network aware API" "wherein use of the re-implemented network aware API enables the application to be developed once and deployed multiple times. Rennard teaches "an architecture for an interactive real-time distributed navigation system." Rennard Column 5 lines 7-8. Bahrs "provides an architectural pattern for creating applications for a data processing system."..."an architectural pattern for views in a client" Bahrs Column 2 lines 55-56; Column 14 lines 37-39. These are different inventions and do not perform the same function. That is, Bahrs presents a method "on how to build applications," Rennard presents "an architecture for an interactive real-time distributed navigation system," where the current invention enables the application to be "developed once and deployed multiple times" through the use of "re-implemented, network aware API." Therefore, Applicants assert that the combination of Bahrs and Rennard can not be used for a 103 rejection of Claims 9, 10, and 12 as Rennard and Bahrs, in isolation or in combination, do

not teach or suggest every aspect of the current invention. Based on this and the foregoing

arguments, Applicants request there removal of these 103 rejections.
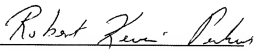

Conclusion

In view of the foregoing, the Applicants' believe that the application is in condition for

allowance and respectfully request favorable reconsideration.

In the event the Examiner deems personal contact desirable in the disposition of this case,

the Examiner is invited to call the undersigned attorney at (508) 293-6985.

Please charge all fees occasioned by this submission to Deposit Account No. 05-0889.

Respectfully submitted,

Dated: _February 2, 2007_   _Robert Kevin Perkins_

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